UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

ROSS MORGAN

Plaintiff

NO. 6:18-cv-06778-FPG-MWP

VS.

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CONCOURS CLASSIC MOTOR CARS,

INC. DBA CONCOURS CLASSIC

RESTORATION

NOTICE OF MOTION FOR ENTRY

OF JUDGMENTS

and

CLARK RITTERSBACH,

Defendants :

PLEASE TAKE NOTICE that upon the Affidavit of Ross Morgan, sworn to August 31, 2019, with exhibits attached thereto (including but not limited to the Affidavit of Confession of Judgment executed by defendant Clark Rittersbach on behalf of himself sworn to on May 21, 2019, the Affidavit of Confession of Judgment executed by defendant Clark Rittersbach on behalf of defendant Concours Classic Motor Cars, LLC dba Concours Classic Restoration, sworn to May 16, 2019, the Declaration of Stephen F. Gehringer, Esq., and the accompanying Memorandum of Law), Plaintiff Ross Morgan, by his attorneys, the Law Offices of Bruce Shaw, P.C., will move this Court before the Honorable Marian W. Payson at the United States Courthouse, 100 State Street, Rochester, New York, at a date and time to be set by the Court, for an Order directing the Clerk of Court to enter separate judgments against defendants Clark Rittersbach and Concours Classic Motor Cars, LLC dba Concours Classic Restoration pursuant to Rule 64 of the Federal Rules of Civil Procedure, Section 3218 of the New York Civil Practice Law and Rules, and the legal precedent cited in the accompanying Memorandum of Law, in the amount of \$1,511,493.50, and with such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Plaintiff intends to file and serve reply papers, if necessary.

Dated this 4th day of September 2019

LAW OFFICES OF BRUCE SHAW, P.C.

/s/ Stephen F. Gehringer, Esq.
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